

**UNITED STATES DISTRICT COURT
DISTRICT OF UTAH**

JIM CURRY, *et. al.*, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

MRS. FIELDS GIFTS, LLC,

Defendant.

**STIPULATED MOTION FOR ENTRY
OF REVISED CASE MANAGEMENT
DEADLINES**

Case No. 2:22-cv-00651-JNP-DBP

District Judge Jill N. Parrish
Magistrate Judge Dustin B. Pead

By and through their respective counsel, Plaintiffs and Defendant Mrs. Fields Gifts, LLC, submit this Stipulated Motion for the Entry of New Case Management Deadlines:

Relief requested: This Stipulated Motion seeks an Order setting forth new case management case deadlines extended from the existing case deadlines. Any deadlines not mentioned below will remain the same. The present and proposed schedule are as follows:

Event	Present Date	Proposed Date
PLEADINGS		
Deadline to answer complaint	8/27/2024	9/17/2024
FACT DISCOVERY		
Deadline to serve written discovery	10/28/2024	11/18/2024
Deadline for fact discovery to close	11/26/2024	12/17/2024
Deadline for supplementation of disclosures and responses under Fed. R. Civ. P. 26(e)	11/26/2024	12/17/2024
EXPERT DISCOVERY		
Plaintiffs' notice of designation required by DUCivR 26-1(a)(2)	10/7/2024	12/27/2024
Plaintiffs' Fed. R. Civ. P. 26(a)(2) disclosures and reports	10/7/2024	12/27/2024
Defendant's notice of designation required by DUCivR 26-1(a)(2) –	11/7/2024	1/28/2024
Defendant's Fed. R. Civ. P. 26(a)(2) disclosures and reports	11/7/2024	1/28/2024
Rebuttal Fed. R. Civ. P. 26(a)(2) disclosures and reports	11/21/2024	2/18/2024
Deadline for expert discovery to close	12/13/2024	3/18/2024
MOTION FOR CLASS CERTIFICATION		
Deadline to file any class certification motion	12/20/2024	3/25/2025
Deadline to file opposition brief	2/3/2025	4/25/2025
Deadline to file reply brief	2/18/2025	5/13/2025
DISPOSITIVE MOTIONS		
1. Deadline for filing	2/4/2025	5/6/2025
2. Deadline for filing opposition	3/4/2025	6/6/2025
3. Deadline to file replies	3/18/2025	6/20/2025

Grounds: The Court entered the operative case management schedule on January 16, 2024. The Court stayed the case on April 5, 2024 (ECF No. 60) to afford the parties time to attend mediation. The parties attended mediation on June 27, 2024. A settlement was not reached. The parties then jointly sought the entry of a revised proposed schedule set forth above, which extended all remaining case management deadline by approximately 90 days. (ECF No. 63).

Following the Court's denial of Defendant's second motion to dismiss, the parties have continued to explore whether resolution is possible. To facilitate those discussions, the parties request a further extension of the case deadlines as listed above. The proposed schedule extends fact discovery by three weeks, sequences expert discovery to occur after the close of fact discovery includes additional time to allow for the holidays, and proportionally extends time for class certification and dispositive motions.

Respectfully Submitted,

/s/
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that he caused the foregoing **STIPULATED MOTION FOR ENTRY OF REVISED CASE MANAGEMENT DEADLINES** to be filed with the Court through its CM/ECF system, this 2nd day of July, 2024, which will serve copies hereof electronically on the following counsel registered for CM/ECF notification:

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/s/ Jacquelyn E. Fradette